

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WELLS FARGO BANK, N.A.,

PLAINTIFF,

VS.

MILTON HOLMES; CITY OF CHICAGO;
UNKNOWN OWNERS AND NON-
RECORD CLAIMANTS,

DEFENDANTS.

NO. 1:13-cv-05410

9422 SOUTH LAFAYETTE AVENUE
CHICAGO, IL 60620

HONORABLE SAMUEL DER-YEGHIAYAN

MOTION FOR ENTRY OF CONSENT JUDGMENT OF FORECLOSURE

NOW COMES the Plaintiff, WELLS FARGO BANK, N.A., by and through its attorneys, Pierce & Associates, P.C., and for its Motion for the Entry of a Consent Foreclosure pursuant to 735 ILCS 5/15-1402 states as follows:

1. That plaintiff filed an action to foreclose a mortgage on the property known as 9422 SOUTH LAFAYETTE AVENUE, CHICAGO, IL 60620.

2. That it was deemed that it would be in the best interest of all parties to enter into a Consent Judgment of Foreclosure to settle and resolve any and all outstanding issues between them.

3. That pursuant to 735 ILCS 5/15-1402, plaintiff offers to the defendant a Consent Judgment of Foreclosure which shall be entered herein, to waive any and all rights to a personal judgment for deficiency against the mortgagor and any other persons liable for payment of the indebtedness.

4. That this offer has been made pursuant to this Motion with Notice to all parties named in this Mortgage Foreclosure not in default.

5. Attached hereto is the Affidavit of said defendants expressly consenting to the entry of the Consent Judgment of Foreclosure.

6. That Notice has been given to all parties who have not previously been found to be in default.

WHEREFORE, pursuant to 735 ILCS 5/15-1402, Plaintiff and Defendants respectfully request that this court grant Plaintiff and Defendants joint motion for entry of a Consent of Judgment of Foreclosure which will have the effect of conveying clear and absolute title and into the property to the Plaintiff herein.

Respectfully Submitted,

WELLS FARGO BANK, N.A.

By: /s/Brian R. Merfeld
Attorney for Plaintiff

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***THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE.***